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July 12, 2024

VIA PACER E-FILING

Hon. Arun Subramanian, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007-1312

Re: **Does vs. USVI, 1:23-cv-10301-AS**

Dear Hon. Judge Subramanian:

The motion for sanctions is DENIED without prejudice. The motion may be refiled after a decision on the pending motions to dismiss. The motion for an extension is DENIED as moot.

The Clerk of Court is directed to terminate the motions at ECF Nos. 126, 135, and 140.

SO ORDERED.

Arun Subramanian, U.S.D.J.
Date: July 12, 2024

This office represents Plaintiffs in this action. I have conferred with Eric Breslin, Esq. counsel for Stacey Plaskett, Esq., and he has agreed to a three-week extension of time to oppose Stacey Plaskett's Rule 11 Motion (Doc. No 126 and No. 127). We Plaintiffs respectfully request that the Court grant the extension to August 2, 2024.

Relatedly, two additional parties have erroneously joined in Stacey Plaskett's Rule 11 Motion for Sanctions: (1) Kenneth Mapp joined in the Rule 11 Sanctions (Doc. No 135); and (2) Governor John De Jongh (Doc. No. 131) whose request joined as well was incorporated within their motions to dismiss. The parties did not comply with Federal Rule of Civil Procedure Rule 11. Plaintiffs were neither served with a Rule 11 letter by these parties and the motions were not filed 21 days after being served with the requisite letter. As such, these joinder requests should, respectfully, be denied. It is our position that the joinder is a nullity. Additionally, both motions are frivolous and no grounds for sanctions exist where Plaintiffs claims are predicated on meritorious grounds.

Even though the joinder motions are null, void and improper, our office has reached out to counsel for John De Jongh who has agreed to an extension to August 2, 2024. As for Kenneth Mapp, considering he is still represented by Motley Rice, LLC and the U.S. Virgin Islands Department of Justice and they have a pending motion to be relieved as counsel for Kenneth Mapp, we request that the Court issue an extension to August 2, 2024 until a decision is determined on the motion to be relieved.

I thank the Court for its attention to this matter.

Respectfully submitted,
MERSON LAW, PLLC

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